

James Lee, Bar No. 12153
Taylor C. Hartley, Bar No. 11397
LIBERTY LAW, PLLC
21 E. 100 N., Ste. 202
American Fork, UT 84003
Telephones: 801-709-6309 (office); 801-404-4987 (cell)
Facsimile: 801-228-2554
Email: taylor@utahlibertylaw.com
Attorneys for Defendant

**IN THE UNITED STATES DISTRICT
DISTRICT OF UTAH, CENTRAL DIVISION**

STATE OF UTAH, Plaintiff, v. PATIENCE O'DOWD, and GARY MILES, Defendants.	REQUEST FOR DISCOVERY Case No.: 2:20-cr-00332 Judge: DAPHNE A. OBERG
---	---

Taylor C. Hartley, hereby, submits this Request for Discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure, Brady v. Maryland, 373 U.S. 83 (1963), Giglio v. United States, 405 U.S. 150 (1972), and the Jencks Act, as applicable.

DATED this 20th day of November 2020.

LIBERTY LAW, PLLC

/s/ Taylor C. Hartley
TAYLOR C. HARTLEY
Attorney at Law

CERTIFICATE OF SERVICE

I certify that on the 20th day of November 2020, I caused a true and correct copy of the

REQUEST FOR DISCOVERY to be delivered as follows:

		Electronic Filing	First Class Mail	Email	Fax	Hand Delivery
To:	TRINA A. HIGGINS, ASSISTANT U.S. ATTORNEY trina.higgins@usdoj.gov LYNDA R. KRAUSE, ASSISTANT U.S. ATTORNEY lynda.krause@usdoj.gov GLEN PROCTOR glen.proctor@usdoj.gov				X	

/s/ Taylor C. Hartley
TAYLOR C. HARTLEY
Attorney at Law